

REMARKS/ARGUMENTS

Applicant has amended the claims in response to the Office Action of September 7, 2006 to correct minor informalities and to more clearly define the present invention. In particular, claims 9 and 19 have been amended to correct typographical errors. Claim 8 has been amended to include the limitation previously found in claim 11 and claim 11 has been canceled. In addition, claims 12 and 20 have been amended to correspond to the changes made to parent claim 8.

The applicant respectfully requests that the present amendments be entered. The present amendments materially limit the issues remaining in the application and do not raise any new issues, nor, in particular, raise the issue of new matter. Therefore entry of the present amendments to the claims is proper under 37 CFR 1.116(b).

The Examiner has rejected claims 8, 13, 15 and 18-19 under 35 USC 102(b) as being anticipated by Hwang et al. In light of the amendment made to claim 8, it is respectfully submitted that this rejection is no longer applicable. In particular, claim 8 has been amended to include the limitation that was previously found in claim 11, a claim that was not rejected under this anticipation rejection. Therefore, it is clear that the rejection can no longer be maintained and it is respectfully requested that this rejection be withdrawn.

The Examiner has rejected claim 9 under 35 USC 103(a) as being unpatentable over Hwang et al. as applied above and further in view of Kokaku et al. It is again respectfully submitted that in light of the amendment made to claim 8, that this rejection is no longer applicable. In particular, because claim 8 now includes the limitation previously found in claim 11, and claim 11 was not rejected under

this rejection, it is clear that such rejection can no longer be maintained. It is respectfully requested that this rejection be withdrawn.

The Examiner has rejected claim 14 under 35 USC 103(a) as being unpatentable over Hwang et al. as applied above and further in view of Ahn et al. This rejection is now moot for the same reasons as noted above, i.e., the inclusion in claim 8 of the limitation previously found in claim 11 that was not rejected in this rejection. Therefore, it is respectfully requested that this rejection be withdrawn.

The Examiner has rejected claim 17 under 35 USC 103(a) as being unpatentable over Hwang et al. as applied above and further in view of Kokaku et al. and George et al. This rejection also is now moot for the reasons noted above, i.e., the inclusion in claim 8 of the limitation previously found in claim 11 that was not rejected in this rejection. Therefore, it is respectfully requested that this rejection be withdrawn.

There remains only one statement of rejection. In particular, the Examiner has rejected claims 11-12 and 20 under 35 USC 103(a) as being unpatentable over Hwang et al. as applied above and further in view of George et al., wherein George et al. is relied on for teaching ALD formed layers of particular thickness and composition.

These rejections are respectfully traversed and it is respectfully submitted that the present invention is patentably distinct from Hwang et al. in combination with George et al.

In light of the above, it is respectfully submitted that present claims 1-12 and 20 are patentably distinct from Hwang et al. in combination with George et al. and it

is respectfully requested that the rejection of such claims under 35 USC 103(a) be withdrawn.

As previously noted that method of Hwang et al. comprises rotating a series of vapor injector pipes above a number of stationary substrates that are being treated. This is vastly different from the method of the present invention wherein the substrate is conveyed past a series of fixed deposition sources. While Hwang et al. provided passing mention that the susceptors could rotate instead of the vapor injection pipes, there is no detail provided. While this might be possible with the substrates (i.e., individual wafers) of Hwang et al., it would be clear to one skilled in the art that such an arrangement could not possible work when the substrate is a polymer film as required by the present invention.

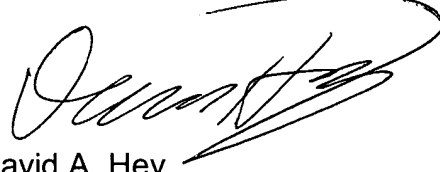
Further, George et al. does not overcome this monumental deficiency in Hwang et al. Rather, as noted George et al. has been cited primarily for showing deposition to a particular thickness on an organic polymer. There is virtually no description in George et al. of the method for carrying out deposition and certainly no suggestion whatsoever as to how the problems noted above with respect to Hwang et al. would be overcome.

Therefore, it is respectfully submitted that even if Hwang et al. and George et al. were combined the result could not possible meet the specific method limitations of the present invention. It is respectfully requested that this rejection be withdrawn.

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In light of the above amendments and remarks, it is respectfully submitted that the present application is in condition for allowance and further action consistent therewith is respectfully requested.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'David A. Hey', with a large, sweeping flourish extending from the end of the signature.

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